



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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May 6, 2005

SENT BY E-Mail, and
First Class U.S. Mail

John K. Habib, Esq.
Keegan, Werlin & Pabian, LLP
265 Franklin Street
Boston, MA 02110

Re: New England Gas Company, D.T.E. 05-24

Dear Mr. Habib:

Enclosed is the first set of information requests by the Department of Telecommunications and Energy to New England Gas Company regarding the above-captioned matter. Please submit copies of the Company's responses to the information requests to the Department by 5:00 p.m., May 20, 2005.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel
Hearing Officer

Enc.
cc: Service List
Mary Cottrell, Secretary

FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
NEW ENGLAND GAS COMPANY

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to New England Gas Company ("New England" or "Company") the following information request(s) with respect to the March 31, 2005 Service Quality ("SQ") Report, ("Filing") D.T.E. 04-25.

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills,

checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, one copy to the Service List, and three copies of the responses to Jody M. Stiefel, Hearing Officer.

Requests

- DTE 1-1 Refer to the Company's commentary on Consumer Division Cases and Billing Adjustments in Section 2 of the filing. The Company states that the Company requires clarification from the Department on the classification rationale for certain calls and that its 2004 performance in this measure is at least partially attributable to communication problems between itself and the Department.
- (a) What aspect of the current rationale is unclear to the Company?
 - (b) Explain how this issue impacts the Company's performance in this measure.
 - (c) Comment on how staff changes impacted the Company's performance in this measure.
- DTE 1-2 Refer to page 2 of Appendix E of the filing. Please comment on the Fall River division's substantial increase in capital expenditures during 2004 relative to prior levels. What factors are primarily responsible for driving this increase in expenditures?
- DTE 1-3 Refer to Appendix G of the filing. Comment on the reduction of staff during 2004. Identify the function each staff member served prior to leaving the Company.